A subsidiary of BMW AG

BMW Manufacturing Corp.



August 8, 2000

The Performance Track Information Center C/o Industrial Economics Incorporated 2067 Massachusetts Avenue Cambridge, MA 02140

Dear Sir or Madam:

Congratulations to the EPA and IEI in rolling out the National Environmental Performance Track recognition program. The team has done a very good job in an unbelievably short period of time.

BMW Manufacturing Corp. feels it is uniquely qualified within the automobile industry to submit an application for this program. We already meet 100% of the entry requirements. Our Environmental Management System has been in place since our plant was opened in 1994 and it has been certified to ISO 14001 for two years this month. Our continuous improvement program has successfully yielded results that improve the environment and reduce cost (by eliminating waste).

Our corporate environmental policy calls on our associates to help maintain our position as the industry leader in environmental issues. We have an excellent record of compliance and are often called on to mentor other organizations on pollution prevention, waste minimization and recycling. Our parent company is the only automobile manufacturer included in the 30 companies that comprise the Dow Jones Global Sustainability Index. We have been members of the South Carolina Environmental Excellence Program since its inception in 1998 and we look forward to becoming a Charter Member of the EPA's program soon.

If you have any questions concerning the application, please call me at (864) 989-5764. Good luck with this very important program.

Sincerely.

Gary N. Weinreich

Environmental Services Manager

Jary Weinreich

BMW Manufacturing Corp.

Enclosure: National Environmental Achievement Track Application & Checklist



National Environmental Achievement Track

Application Form

BMW MANUFACTURING CORP.
Name of facility
BMW GROUP
Name of parent company (if any)
1400 HIGHWAY 101 SOUTH
Street address
Street address (cont.)
GREER SC 29651
City/State/Zip code
Give us information about your contact person for the National Environmental Achievement Track Program.
Name GARY WEINREICH
Title ENVIRONMENTAL SERVICES MANAGER
Phone 864-989-5764
Fax 864-801-5764
E-mail GARY. WEINREICH @BMWMC, COM

EPA needs background information on your facility to evaluate your application.

What do you need to do?

- Provide background information on your facility.
- Identify your environmental requirements.



1	What do	you do	or make	at your	facility?
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BAW MANUFACTURING CORP. NAVUFACTURES AUTOMOBILES AND LIGHT-DUTY TRUCKS AT ONE OF THE NEWEST AND MOST ENVIRONMENTALLY- FRIENDLY FACILITIES OF ITS KIND IN WORLD.

List the Standard Industrial Classification (SIC) code(s) or North American Industrial Classification System (NAICS) codes that you use to classify business at your facility.

SIC 3711

NAICS

336111 336112

- Does your company meet the Small Business Administration definition of a small business for your sector?
- How many employees (full-time equivalents) currently work at your facility?
- Fewer than 50

50-99

100-499

500-1,000

More than 1,000

5	Does your facility have an EPA ID number(s)?	Yes No
	If yes, list in the right-hand column.	50000110288
6	Identify the environmental requirements that apply to your facility. Use the Environmental Requirements	(CHECKLIST ENCLOSED)
	Checklist, at the back of the instructions, as a reference. List your requirements to the right or enclose a completed Checklist with your application.	
7	Check the appropriate box in the right-hand column.	I've listed the requirements above. Tve enclosed the Checklist with my application.
8	Optional: Is there anything else you would like to tell us about your facility?	1997 GOVERNOR'S POLLUTION PREVENTION AWARD 1998-PRESENT - S.C. ENVIRONMENTAL
		EXCELLENCE PROGRAM ENVIRONMENTAL REPORTS TO PUBLIC 1995, 1997, 1999

Facilities must have an operating Environmental Management System (EMS) that meets certain requirements.

What do you need to do?

- Confirm that your EMS meets the Achievement Track requirements.
- Tell us if you have completed a self-assessment or have had a third-party assessment of your EMS.



1	Check yes if your EMS meets the requirements for each element below as defined in the instructions.	
	a. Environmental policy	Yes
	b. Planning	Yes
	C. Implementation and operation	Yes
	d. Checking and corrective action————————————————————————————————————	Yes
	C. Management review	Yes
2	Have you completed at least one EMS cycle (plan-do-check-act)?	Yes
3	Did this cycle include both an EMS and a compliance audit?	Yes
4	Have you completed an objective self-assessment or third-party assessment of your EMS?	Yes
	If yes, what method of EMS assessment did you use?	Self-assessment
		GEMI Other
		CEMP ———
		Third-party assessment
		TSO 14001 Certification
		Other

Facilities must show that they are committed to improving their environmental performance. This means that you can describe past achievements and will make future commitments.

Section Tell us about your past achievements and future commitments.

What do you need to do?

Refer to the Environmental Performance Table in the instructions to answer questions I and 2.

Describe your past achievements for at least two environmental aspects. If you need more space than is provided, attach copies of this page.

Note to small facilities: If you qualify as a small facility as defined in the instructions, you are required to report past achievement for at least one environmental aspect.

First aspect you've selected

What aspect have you selected?	What was the p (2 years ago)?	revious level	What is the cu	rrent level?
	Quantity	Units	Quantity	Units
SOLID WASTE (Z3 ROADSTER)	199	POUNDS PER VEHICLE	163	POUNDS PER VEHICLE

i. How is the current level an improvement over the previous level?

THE CURRENT LEVEL REPRESENTS AN 18% REDUCTION IN YOTAL WASTE PER VEHILLE OR ALMOST 2 MILLION WASTE AVOIDED PER YEAR

ii. How did you achieve this improvement?

PLANTWIDE WASTE REDUCTION TARBET AND REDUCTION PROGRAMS WITHIN DEPARTMENTS , NOLUDING: RETURNABLE PACKAGING, WASTE PAINT REDUCTION, SOLVENT SUBSTITUTION OTHERS.

Second aspect you've selected

What aspect have you selected?	What was the p (2 years ago)?	revious level	What is the cu	rrent level?
	Quantity	Units	Quantity	Units
PROCESS WASTEWATER	449	GALLONS PER VEHICLE	396	GALLOUS PER VEHILLE

i. How is the current level an improvement over the previous level?

THE CURPENT LEVEL REPRESENTS A 12% DECREASE IN THE VOLUME OF WASTEWATER GENERATED PER VALUE AND ALMOST 3 MILLION GALLONS PER YEAR REDUCTION.

ii. How did you achieve this improvement?

WATER SHUTDER SENSORS WERE INSTALLED ON RINSES WHEN NO VEHICLE BODY IS PRESENT IN CARPIERS. CLEAVER RIVSE WATERS WERE REUSED RATHER THAN DISCHARGED. PLANTWIDE WASTEWATER REDUCTION TARGET ADOPTED BY TOP MANAGEMENT.

2 Select at least four environmental aspects (no more than two from any one category) from the Environmental Performance Table in the instructions and then tell us about your future commitments. If you need more space than is provided, attach copies of this section.

Note to small facilities: If you are a small facility, you are required to make commitments for at least two environmental aspects in two different categories.

First aspect you've selected

- a. What is the aspect?
- b. Is this aspect identified as significant in your EMS?
- c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.

CONSUMPTION

⊢ No

Option A: Absolute value

(Quantity/Units)

Option B:

In terms of

20.6 MILLION BEY/VEHICLE

units of production (Quantity/Units)

or output

d. What is the improvement you are committing to over the next three years? You may choose to state this as an absolute value or in terms of units of production or output.

Option A:
Absolute value

(Quantity/Units)

Option B: In terms of units of production or output

16.0 MILLION BEU /VEHICLE (Quantity/Units)

e. How will you achieve this improvement?

PRODUCTION EQUIPMENT

IDENTIFY & REPAIR COMPRESSED

AIR LEAKS

UTILIZE LANDFILL GAS IN EXISTING COGENERATION UNITS

Second aspect you've selected

a. What is the aspect?

b. Is this aspect identified as significant in your EMS?

c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.

d. What is the improvement you are committing to over the next three years? You may choose to state this as an absolute level or in terms of units of production or output.

e. How will you achieve this improvement?

EMISSION OF HAZARDOUS AIR POLLUTANTS

Yes

No

Option A:
Absolute value

(Quantity/Units)

Option B: In terms of units of production or output 1.2 RELEASES/VEHICLE
(Quantity/Units)

Option A:
Absolute value

(Quantity/Units)

Option B: In terms of units of production or output POUPDS TRI
1.0 RELEASES/VEH.*
(Quantity/Units)

EVALUATE SOLVENT SUBSTITUTION

TO NON-HAP, NON-TRI

EVALUATE & IMPLEMENT SOLVENT

REWIERY & RECYCLE

REDUCE NUMBER OF COLOR CHANGES

* BASED ON ASSUMPTION THAT THRESHOLDS FOR ADDITIONAL COMPOUNDS WILL NOT BE TRIGGERED.

Third aspect you've selected

- a. What is the aspect?
- b. Is this aspect identified as significant in your EMS?

- c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.
- d. What is the improvement you are committing to over the next three years? You may choose to state this as an absolute level or in terms of units of production or output.
- e. How will you achieve this improvement?

CHEMILAL

No

Option A:

Absolute value

(Quantity/Units)

Option B: In terms of units of production or output

POUPDS/ VEHICLE

Option A: Absolute value

(Quantity/Units)

Option B: In terms of units of production or output

REDUCE NUMBER OF COLOR CHANGES SOLVENT REDUCTION & SUBSTITUTION SOLVENT RELOVERY & REUSE

Fourth aspect you've selected

- a. What is the aspect?
- b. Is this aspect identified as significant in your EMS?
- c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.
- d. What is the improvement you are committing to over the next three years? You may choose to state this as an absolute level or in terms of units of production or output.
- e. How will you achieve this improvement?

AIR EMISSIONS (VOCS)

Option A:

Absolute value

(Quantity/Units)

Option B: In terms of units of production or output

POUNDS/ 2.72 VEHICLE (Quantity/Units)

Option A: Absolute value

(Quantity/Units)

Option B: In terms of units of production or output

bonnos (Quantity/Units)

COLOR BLOCKING TO REDUCE COLOR CHANGES (WASTE PAINT AND PURGE SOLVENT) REDUCED NUMBER OF PRIMER COLORS

NEW PAINTED BODY WAREHOUSE

Facilities must demonstrate their commitment to public outreach and performance reporting. You should have appropriate mechanisms in place to identify community concerns, to communicate with the public, and to provide information on your environmental performance.

Section D

Tell us about your public outreach and reporting.

What do you need to do?

- Describe your approach to public outreach.
- List three references who are familiar with your facility.
- 1 How do you identify and respond to community concerns?

2 How do you inform community members of important matters that affect them?

3 How will you make the Achievement Track Annual

Performance Report available to the public?

PROCEDURE FOR ENVIRONMENTAL

COMMUNICATIONS

COMMUNICATIONS

COMMUNITY SURVEYS

CITIZEN ADVISORY PANEL*

OPEN DOOR POLICY

PLANT TOURS

VISITORS CENTER W/ ENVIRONMENTAL

IN FORMATION

ENVIRONMENTAL REPORTS

NEWSLETTERS

NEWSPAPER ARTICLES

COMMUNITY ASSOCIATIONS

CITIZEN ADVISORY PANEL*

- Website www BNWUSFACTORY.COM
- Newspaper
- Open Houses (DAILY PLANT TOURS)
- u Other

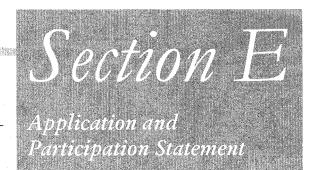
NEWSLETTERS

^{*} CITIZEN ADVISORY PANEL BEING FORMED IN THIRD QUARTER 2000.

4 Are there any ongoing citizen suits against your facility?	Yes	No
If yes, describe briefly in the right-hand column.		

5 List references below.

	Organization	Name	Phone n	umber
Representative of a Community/ Citizen Group	SIERRA CLUB - JOHN BERTRAN CHAPTER	NORM		268-9409
State/Local regulator	SC DEPT. OF HEALTH & ENVIRONMENTAL CONTROL	• •	wis SHAW Y commissioner	(803) 898-3900
Other community/local reference	UNIVERSITY OF SOUTH CAROLINA - INSTITUTE FOR PUBLIC AFFAIRS	DR. D	OUG POBSON	(803) 777-8157



On behalf of BMW MANUFACTURING CORP. [my facility],

I certify that

- I have read and agree to the terms and conditions, as specified in the National Environmental Achievement Track Program Description and in the Application Instructions;
- I have personally examined and am familiar with the information contained in this Application (including, if attached, the Environmental Requirements Checklist). The information contained in this Application is, to the best of my knowledge and based on reasonable inquiry, true, accurate, and complete, and I have no reason to believe the facility would not meet all program requirements;
- My facility has an environmental management system (EMS), as defined in the Achievement Track EMS requirements, including systems to maintain compliance with all applicable federal, state, tribal, and local environmental requirements, in place at the facility, and the EMS will be maintained for the duration of the facility's participation in the program;
- My facility has conducted an objective assessment of its compliance with all applicable federal, state, tribal, and local environmental requirements, and the facility has corrected all identified instances of potential or actual noncompliance;
- Based on the foregoing compliance assessment and subsequent corrective actions (if any were necessary), my facility is, to the best of my knowledge and based on reasonable inquiry, currently in compliance with applicable federal, state, tribal, and local environmental requirements.

I agree that EPA's decision whether to accept participants into or remove them from the National Environmental Achievement Track is wholly discretionary, and I waive any right that may exist under any law to challenge EPA's acceptance or removal decision.

I am the senior facility manager and fully authorized to execute this statement on behalf of the corporation or other

Signature/Date	Jel 8-8-00
Printed Name/Title	DR. HELMUT LEUBE PRESIDENT
Facility Name	BHW MANUFACTURING CORP.
Facility Street Addres	s 1400 HIGHWAY 101 SOUTH GREER, SC 29451
Facility ID Numbers	SC 0000 110288 SFIP: AUT. SC00 53 APS: 4509 300230 TRI: Z9651BMWNN 1400 H

legal entity whose facility is applying to this program.

National Environmental Achievement Track

Environmental Requirements Checklist

The following *Checklist* is provided to assist facilities in answering *Section A, Tell us about your facility," Question 6.* The *Checklist* is given to help facilities identify the major federal, state, tribal, and local environmental requirements applicable at their facilities. The *Checklist* is not intended to be an exhaustive list of all environmental requirements that may be applicable at an individual facility.

If you use this *Checklist* and choose to submit it with your application, fill in your facility information below and enclose the completed *Checklist* with your application (see instructions).

Facility Loc		2.55
	RCR: SC0000110288 AFS: 4508	3 200 230
Facility ID (attach addi	Number(s): SFIP: AUT. SC 0053 TRI: 2965 tional sheets if necessary)	18MWMN 1400H
Air Pollution	n Regulations	Check All That Apply
1.	National Emission Standards for Hazardous Air Pollutants (40 CFR 61)	□ 500N
2.	Permits and Registration of Air Pollution Sources	<u>-</u>
3.	General Emission Standards, Prohibitions and Restrictions	
4.	Control of Incinerators	-
5.	Process Industry Emission Standards	-
6.	Control of Fuel Burning Equipment	
7.	Control of VOCs	9
8.	Sampling, Testing and Reporting	₽
9.	Visible Emissions Standards	
10.	Control of Fugitive Dust	
11.	Toxic Air Pollutants Control	
12.	Vehicle Emissions Inspections and Testing	
Othe	r Federal, State, Tribal or Local Air Pollution Regulations Not Listed Ab	ove (identify)
13.	SC AIR TOLICS STANDARD	B
14.	SC LAER for VOC SOURCES 7 100 TPY	

Hazardous Waste Management Regulations

1.	Identification and Listing of Hazardous Waste (40 CFR 261) - Characteristic Waste	
	- Listed Waste	
2.	Standards Applicable to Generators of Hazardous Waste (40 CFR 262)	달
	- Manifesting	₽
	- Pre-transport requirements	
	- Record keeping/reporting	
3.	Standards Applicable to Transporters of Hazardous Waste (40 CFR 263)	
5.	- Transfer facility requirements	
	- Manifest system and record-keeping	
	* * *	
4	- Hazardous waste discharges	
4.	Standards for Owners and Operators of TSD Facilities (40 CFR 264)	
	- General facility standards	
	- Preparedness and prevention	
	- Contingency plan and emergency procedures	
	- Manifest system, Record keeping and reporting	
	- Groundwater protection	
	- Financial requirements	
	- Use and management of containers	
	- Tanks	
	- Waste piles	
	- Land treatment	
	- Incinerators	
5.	Interim Status Standards for TSD Owners and Operators (40 CFR 265)	
6.	Interim Standards for Owners and Operators of New Hazardous Waste	
	Land Disposal Facilities (40 CFR 267)	. 🗇
7.	Administered Permit Program (Part B) (40 CFR 270)	
	er Federal, State, Tribal or Local Hazardous Waste Management Regulat ed Above (identify)	ions Not
	122010 (100/100/)	
8.	SC Solid & HAZARDOUS WASTE REGS.	
9.		
<i>,</i>		
Hazardous l	Materials Management	

1.	Control of Pollution by Oil and Hazardous Substances (33 CFR 153)	
2.	Designation of Reportable Quantities and Notification of Hazardous	
	Materials Spill (40 CFR 302)	
3.	Hazardous Materials Transportation Regulations (49 CFR 172-173)	<u>u</u>
4.	Worker Right-to-Know Regulations (29 CFR 1910.1200)	9
5.	Community Right-to-Know Regulations (40 CFR 350-372)	P

6.		
7.		
Waste	Management	
1.	Criteria for Classification of Solid Waste Disposal Facilities	
	and Practices (40 CFR 257)	
2.	Permit Requirements for Solid Waste Disposal Facilities	
3.	Installation of Systems of Refuse Disposal	
4.	Solid Waste Storage and Removal Requirements	
5.	Disposal Requirements for Special Wastes	B
	er Federal, State, Tribal or Local Solid Waste Management Regulations Not Live (identify)	sted
6.	Δ.	
7.		
,	tion Control Requirements	
1.	Oil Spill Prevention Control and Countermeasures (SPCC) (40 CFR 112)	<u> </u>
1. 2.	Oil Spill Prevention Control and Countermeasures (SPCC) (40 CFR 112) Designation of Hazardous Substances (40 CFR 116)	e e
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er Regulations	
Underground Injection and Control Regulations, Crieria and Standards (40 CFR 144, 146)	
National Primary Drinking Water Standards (40 CFR 141)	
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Subsurface Sources	
Underground Injection Control Requirements	
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Manufacture and Import of Chemicals, Record keeping and Reporting Requirements (40 CFR 704)	ļ
Import and Export of Chemicals (40 CFR 707)	
Pre-Manufacture Notifications (40 CFR 720)	
PCB Distribution Use, Storage and Disposal (40 CFR 761)	
Regulations on Use of Fully Halogenated Chlorofluoroalkanes (40 CFR 762)	
Storage and Disposal of Waste Material Containing TCDD (40 CFR 775)	1
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	Underground Injection and Control Regulations, Crieria and Standards (40 CFR 144, 146) National Primary Drinking Water Standards (40 CFR 141) Community Water Systems, Monitoring and Reporting Requirements (40 CFR 141) Permit Requirements for Appropriation/Use of Water from Surface or Subsurface Sources Underground Injection Control Requirements Monitoring, Reporting and Record keeping Requirements for Community Water Systems Federal, State, Tribal or Local Drinking Water Regulations Not Listed Abo (if)) nees Manufacture and Import of Chemicals, Record keeping and Reporting Requirements (40 CFR 704) Import and Export of Chemicals (40 CFR 707) Chemical Substances Inventory Reporting Requirements (40 CFR 710) Chemical Information Rules (40 CFR 712) Health and Safety Data Reporting (40 CFR 716) Pre-Manufacture Notifications (40 CFR 720)

Pesticide Regulations

1. FIFRA Pesticide Use Classification (40 CFR 162)	
2. Procedures for Disposal and Storage of Pesticides and Containers	
(40 CFR 165)	
3. Certification of Pesticide Applications (40 CFR 171)	
4. Pesticide Licensing Requirements	
5. Labeling of Pesticides	
6. Pesticide Sales, Permits, Records, Application and Disposal Requirements	
7. Disposal of Pesticide Containers	
8. Restricted Use and Prohibited Pesticides	
Other Federal, State, Tribal or Local Pesticides Regulations Not Listed Above	(identify)
9.	
10.	
Comprehensive Environmental Response, Compensation and Liability Act (Superfund) (identify)	
None	
	_
2. RCRA Corrective Action (identify)	
Nohe	
Other Federal, State, Tribal or Local Environmental Clean-Up, Restoration, C Action Regulations Not Listed Above <i>(identify)</i>	orrective
3.	
4.	